

FAIR HOUSING LAW PROJECT

Kim Pederson (California SBN 234785)
Jessica Fry (Legal Services Attorney 800918)
111 West Saint John Street, #315
San Jose, California 95113
Telephone: (408) 280-2458
Facsimile: (408) 293-0106
kimp@lawfoundation.org
jessicaf@lawfoundation.org
Attorneys for Plaintiff
SANDRA PEREZ

BRYAN CAVE LLP

Gregory D. Trimarche (California SBN 043686)
Aaron M. McKown (California SBN 208781)
1900 Main Street, Suite 700
Irvine, California 92614
Telephone: (949) 223-7000
Facsimile: (949) 223-7100
gregory.trimarche@bryancave.com
aaron.mckown@bryancave.com

BRYAN CAVE LLP

Stephanie A. Blazewicz (California SBN 240359)
2 Embarcadero Center, Suite 1410
San Francisco, California 94111
Telephone: (415) 675-3400
Facsimile: (415) 675-3434
stephanie.blazewicz@bryancave.com

Attorneys for Defendant and
Cross-Complainant
COUNTRYWIDE HOME LOANS, INC.
erroneously sued as COUNTRYWIDE HOME
LOANS

Jeffrey S. Nelson (California SBN 149494)
Kathleen J. Moorhead (California SBN 122811)
100 North Wiget Lane, Suite 150
Walnut Creek, California 94598
Telephone: (925) 930-9550
Facsimile: (925) 930-9588
jeffrey.nelson@fnf.com
Attorneys for Cross-Defendant
FIDELITY NATIONAL TITLE COMPANY
(erroneously sued as FIDELITY NATIONAL
TITLE INSURANCE COMPANY)

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

SANDRA PEREZ, an individual,

Plaintiff,

v.

COUNTRYWIDE HOME LOANS, a California
Corporation,

Defendant.

COUNTRYWIDE HOME LOANS, INC., a
New York Corporation,

Cross-Complainant,

v.

FIDELITY NATIONAL TITLE INSURANCE
COMPANY, and ROES 1-10,

Cross-Defendants.

Case No. C07 06402 JW

**STIPULATION TO FILE
AMENDED CROSS-CLAIM AND
EXTEND TIME FOR
COMPLETION OF MEDIATION**

STIPULATION

This Stipulation is entered into by Plaintiff SANDRA PEREZ ("Plaintiff"), Defendant COUNTRYWIDE HOME LOANS, INC. (erroneously sued as Countrywide Home Loans) ("Countrywide"), and Cross-Defendant FIDELITY NATIONAL TITLE COMPANY (erroneously sued as Fidelity National Title Insurance Company) ("Fidelity") (collectively "the Parties").

WHEREAS, on December 18, 2007, Plaintiff filed her Complaint in this action;

WHEREAS, on February 14, 2008, Countrywide filed a Cross-Claim against Fidelity;

WHEREAS, on April 4, 2008, this Court ordered that the Parties participate in mediation within ninety (90) days of Fidelity's first appearance in this action;

1 WHEREAS, on April 11, 2008, Fidelity filed its answer to Countrywide's
2 Cross-Claim;

3 WHEREAS, based on the Court's April 4, 2008 Order, the Parties must
4 participate in mediation no later than July 10, 2008;

5 WHEREAS, Countrywide has learned through discovery that Plaintiff signed
6 the loan documents at issue in this action at the mortgage broker's office, and, thus,
7 the mortgage broker should be a party in this action;

8 WHEREAS, Countrywide now seeks to file an amended Cross-Claim in order
9 to add the mortgage broker, Tony Bayard de Volo dba Lawrence Capital, Inc.
10 ("Lawrence Capital"), as a cross-defendant in this action;

11 WHEREAS, the Parties believe that all parties, including Lawrence Capital,
12 should participate in the mediation;

13 NOW, THEREFORE, the undersigned Parties, through their respective
14 counsel of record, hereby agree and stipulate that:

15 1. Countrywide may file an amended Cross-Claim in order to add
16 Lawrence Capital as a cross-defendant.

17 2. The deadline for the completion of mediation shall be extended to
18 ninety (90) days after the first appearance of Lawrence Capital.

19
20 **IT IS SO STIPULATED.**

21
22 Dated: June 1, 2008

FAIR HOUSING LAW PROJECT

23
24 By: _____
25 Jessica Fry
26 Attorneys for Plaintiff SANDRA PEREZ

27 [SIGNATURES CONTINUED ON FOLLOWING PAGE]
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1 WHEREAS, on April 11, 2008, Fidelity filed its answer to Countrywide's
2 Cross-Claim;

3 WHEREAS, based on the Court's April 4, 2008 Order, the Parties must
4 participate in mediation no later than July 10, 2008;

5 WHEREAS, Countrywide has learned through discovery that Plaintiff signed
6 the loan documents at issue in this action at the mortgage broker's office, and, thus,
7 the mortgage broker should be a party in this action;

8 WHEREAS, Countrywide now seeks to file an amended Cross-Claim in order
9 to add the mortgage broker, Tony Bayard de Volo dba Lawrence Capital, Inc.
10 ("Lawrence Capital"), as a cross-defendant in this action;

11 WHEREAS, the Parties believe that all parties, including Lawrence Capital,
12 should participate in the mediation;

13 NOW, THEREFORE, the undersigned Parties, through their respective
14 counsel of record, hereby agree and stipulate that:

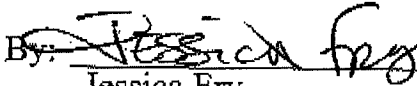
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16 Lawrence Capital as a cross-defendant.

17 2. The deadline for the completion of mediation shall be extended to
18 ninety (90) days after the first appearance of Lawrence Capital.

19
20 **IT IS SO STIPULATED.**

21
22 Dated: May 13, 2008

FAIR HOUSING LAW PROJECT

23
24 By: 
25 Jessica Fry
26 Attorneys for Plaintiff SANDRA PEREZ

27 [SIGNATURES CONTINUED ON FOLLOWING PAGE]
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STIPULATION TO AMEND CROSS-CLAIM
AND EXTEND TIME FOR COMPLETION OF MEDIATION

1 Dated: June 1, 2008

BRYAN CAVE LLP

2
3 By: 

4 Stephanie A. Blazewicz
5 Attorneys for Defendant and Cross-Complainant
6 COUNTRYWIDE HOME LOANS, INC.,
erroneously sued as COUNTRYWIDE HOME
LOANS

7 Dated: May 19, 2008

8
9
10 By: 

11 Jeffrey S. Nelson
12 Attorneys for Cross-Defendant
13 FIDELITY NATIONAL TITLE COMPANY,
14 erroneously sued as FIDELITY NATIONAL
15 TITLE INSURANCE COMPANY

BRYAN CAVE LLP
1900 MAIN STREET, SUITE 700
IRVINE, CALIFORNIA 92614

[PROPOSED] ORDER

Having reviewed the stipulation of the parties, and good cause appearing, IT IS ORDERED that:

1. Countrywide Home Loans, Inc., may file an amended Cross-Claim in order to add Tony Bayard de Volo dba Lawrence Capital, Inc. ("Lawrence Capital") as a cross-defendant.

2. The deadline for the completion of mediation shall be extended to ninety (90) days after the first appearance of Lawrence Capital.

Dated: _____

United States District Judge James Ware

BRYAN CAVE LLP
1900 MAIN STREET, SUITE 700
IRVINE, CALIFORNIA 92614